



Louisiana
Credit Union League

May 29, 2019

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Advanced Methods to Target and Eliminate Unlawful Robocalls, CG Docket No. 17-59;
Call Authentication Trust Anchor, WC Docket No. 17-97

On May 16, 2019, Federal Communications Commission (FCC) Chairman Ajit Pai announced the FCC will consider its draft Declaratory Ruling (the Ruling) and Third Further Notice of Proposed Rulemaking (FNPRM) (CG Docket No 17-59, WC Docket No. 17-97) at its June 6, 2019, open meeting. According to an FCC factsheet, the Ruling would “clarify that voice providers may, as the default, block calls based on call analytics that target unwanted calls, as long as their customers are informed and have the opportunity to opt out of the blocking.” It would also “clarify that voice service providers may offer customers the option to block calls from any number that does not appear on a customer’s ‘white list’ or contact list, on an opt-in basis.” Credit unions have serious concerns regarding the impact the FCC’s proposed actions could have on their ability to communicate with their member-owners.

In regards to the above brief description The Louisiana Credit Union League submits the following concerns:

- Credit union members own their credit union. Therefore, they need and expect to receive calls and text from the credit union. These communications contain critical information, including fraud alerts, account alerts, and collection information among other things.
- While we support efforts to reduce illegal robocalls, we have significant concerns that the action the FCC intends to take is overly broad and could have a significant adverse impact on credit unions’ ability to communicate with their members.



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- Further, neither the credit union nor their members will know when calls are blocked. As a result, they may face costly charges in the form of general liability ranging from \$0 to \$500 for debit account fraud identified within the first 60 days to the full amount of any fraud identified after, \$50 for each instance of credit-card fraud, plus account overdraft fees or over-the-limit fees based on their credit limits.
- The FCC should do more to distinguish between illegal callers and calls from legitimate businesses with pre-existing relationships.
- Today, consumers can opt-in to call blocking services. The FCC intends to reverse this practice and allow consumers to opt-out. Part of the justification for the Ruling is consumers were not aware of their right to opt-in and so few did; however, if consumers did not have enough information to know their right to opt-in, it is unlikely they will have enough information to know their right to opt-out.
- We are concerned that consumers will have insufficient information regarding the consequences of blocking all calls except those on their personal white list or contacts list. For example, members who applied for loans and need to be called by loan officers may not have those loan officers' numbers stored in their phones. This would effectively block credit union calls from reaching members that have opted-in. It could also complicate credit unions' collection efforts, which could delay borrowers getting critical information and subjecting them to adverse credit reporting.

The FCC's order will become effective upon adoption but given these concerns, **the FCC should take more time to consider stakeholder concerns.**

Respectfully Submitted,

Bob Gallman

Bob Gallman
President/CEO
Louisiana Credit Union League

cc: Credit Union National Association